## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

UNITED STATES, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

No: 1:23-cv-00108-LMB-JFA

## DEFENDANT GOOGLE LLC'S SEALING RESPONSE

Plaintiffs filed a motion to seal concerning a redacted exhibit submitted in support of its pending motion to compel (Dkt. No. 232). The exhibit is a letter from Plaintiffs' counsel to Defendant's counsel (Dkt. No. 229-1, *filed under seal as* Dkt. No. 233). Plaintiffs explained that they filed the exhibit under seal to protect potentially confidential information belonging to Defendant (Dkt. No. 234). After reviewing the exhibit, Defendant determined that it does not disclose competitively sensitive information. Therefore, Defendant consents to the unsealing of the exhibit and the filing of an unredacted version in the public record.

Dated: June 2, 2023

Eric Mahr (pro hac vice)
Andrew Ewalt (pro hac vice)
Julie Elmer (pro hac vice)
Lauren Kaplin (pro hac vice)
Jeanette Bayoumi (pro hac vice)
Claire Leonard (pro hac vice)
Sara Salem (pro hac vice)
Tyler Garrett (VSB # 94759)
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
700 13th Street, NW, 10th Floor
Washington, DC 20005

Telephone: (202) 777-4500 Facsimile: (202) 777-4555 eric.mahr@freshfields.com Respectfully submitted,

/s/ Craig C. Reilly
Craig C. Reilly (VSB # 20942)
209 Madison Street, Suite 501
Alexandria, VA 22314

Telephone: (703) 549-5354 Facsimile: (703) 549-5355 craig.reilly@ccreillylaw.com

(additional counsel on next page)

Daniel Bitton (pro hac vice)

AXINN, VELTROP & HARKRIDER LLP

55 2nd Street

San Francisco, CA 94105 Telephone: (415) 490-2000 Facsimile: (415) 490-2001

dbitton@axinn.com

Bradley Justus (VSB # 80533)

Koren Wong-Ervin (pro hac vice)

AXINN, VELTROP & HARKRIDER LLP

1901 L Street, NW

Washington, DC 20036 Telephone: (202) 912-4700

Facsimile: (202) 912-4701

bjustus@axinn.com

Karen L. Dunn (pro hac vice) Jeannie H. Rhee (pro hac vice) William A. Isaacson (pro hac vice)

Joseph Bial (pro hac vice) Amy J. Mauser (pro hac vice) Martha L. Goodman (pro hac vice) Bryon P. Becker (VSB #93384)

Erica Spevack (pro hac vice)

PAUL, WEISS, RIFKIND, WHARTON &

GARRISON LLP 2001 K Street, NW

Washington, DC 20006-1047 Telephone: (202) 223-7300 Facsimile (202) 223-7420 kdunn@paulweiss.com

Counsel for Defendant Google LLC